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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate Procurement Policies and Consider Long-Term Procurement Plans.	)))	R.06-02-013

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), PACIFIC GAS AND ELECTRIC COMPANY (U 39-E), NRG ENERGY, INC., THE UTILITY REFORM NETWORK, COALITION OF CALIFORNIA UTILITY EMPLOYEES, AND THE CALIFORNIA UNIONS FOR RELIABLE ENERGY ON THE DRAFT DECISION OF ALJ BROWN ON NEW GENERATION AND LONG-TERM CONTRACT PROPOSALS AND COST ALLOCATION

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Dated: **July 10, 2006**

Comments Of Southern California Edison Company (U 338-E), Pacific Gas & Electric Company (U 39-E), NRG Energy, Inc., The Utility Reform Network, Coalition Of California Utility Employees, And The California Unions For Reliable Energy

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Pursuant to Article 19 of the Commission's Rules of Practice and Procedure, Southern California Edison Company (SCE), Pacific Gas and Electric Company (PG&E), NRG Energy, Inc. (NRG), The Utility Reform Network (TURN), Coalition of California Utility Employees (CCUE), and the California Unions for Reliable Energy (CURE) (collectively, Joint Parties),[1] respectfully submit these comments on the June 20, 2006 draft decision of Administrative Law Judge (ALJ) Brown on New Generation and Long-Term Contract Proposals and Cost Allocation (Draft Decision).

I.

INTRODUCTION

The Joint Parties commend ALJ Brown for the thoughtful and balanced policy direction presented in the Draft Decision. The Draft Decision provides a sound framework for encouraging the development of new generation resources in California while allowing the continued development of a competitive wholesale electricity market. In order to encourage the

[1] PG&E, NRG, TURN, CCUE, and CURE have authorized SCE to submit this filing on their behalf.

development of new generation in California, the Draft Decision embraces a core principle advocated by the Joint Parties – that the costs and benefits of new generation resources should be allocated equitably to all benefiting customers, including direct access customers, on whose behalf the costs associated with these resources are incurred. The support for the Draft Decision expressed by numerous parties attending the June 28, 2006 meeting conducted by Commission President Peevey demonstrates both the need and support for a cost allocation mechanism that will encourage new generation in California. Certain language in the Draft Decision should, however, be clarified to avoid undermining the effectiveness of the Draft Decision. Specifically, the Draft Decision should be modified:

- To confirm that new generation developed pursuant to the interim cost allocation mechanism will continue to receive the cost recovery treatment adopted in the Draft Decision for the duration of the commitment or at least ten years from the time that a new unit comes on-line, regardless of the subsequent implementation of any market-based systems, such as capacity markets.
- To provide that any opt-out mechanism subsequently adopted by the Commission will apply only to resources acquired under future requests for offers (RFOs).
- To defer all details of the energy rights auction described in the Draft Decision to Phase 2 of this proceeding. The discussion in the Draft Decision should be modified so as not to prejudge the auction design or the nature of the energy rights to be auctioned.
- To allow utility-owned resources to qualify for the Draft Decision's cost recovery mechanism.[2]
- To expressly authorize SCE to proceed in parallel with both the fast-track and standard-track portions of its RFO, to confirm that the latest on-line date for fast-track projects is August 1, 2010, and to clarify that the Commission will consider power purchase agreements (PPAs) slightly longer than ten years in term to capture any remaining peak-season months in the final contract year.

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[2] NRG does not support allowing utility-owned resources to qualify for the Draft Decision's cost recovery mechanism. NRG will address this topic in its own, separately filed comments.

- To clarify that, although renewable projects may participate in new generation RFOs, new generation RFOs are not renewables portfolio standard (RPS) RFOs, and no market price referent (MPR) will be calculated nor will supplemental energy payment (SEP) funds be available to renewable projects that are selected.
- To clarify the definition of "benefiting customers" who would be liable for any non-bypassable charges arising from the new generation commitments.

Subject to the foregoing modifications, as set forth more fully below and in Attachment A, the Draft Decision should be adopted.

II.

THE DRAFT DECISION'S COST ALLOCATION MECHANISM MUST PROVIDE COST RECOVERY FOR SELECTED RESOURCES FOR THE FULL DURATION OF THE COMMITMENT OR AT LEAST TEN YEARS

The Draft Decision appropriately states that its proposed cost allocation mechanism is adopted "*on a limited and transitional basis*" to encourage necessary investment in new generation.[3] However, the Draft Decision contains language that appears to suggest that, once new market institutions are implemented in Phase 2 of the Resource Adequacy proceeding, R.05-12-013, the Draft Decision's proposed cost allocation mechanism would not be applied even to resources that were already approved for cost recovery pursuant to the Draft Decision.[4] While the Joint Parties agree that the cost allocation mechanism is an interim solution, there needs to be regulatory and commercial certainty on cost recovery and cost allocation for contracts entered into while the interim solution is in effect. The development and functioning of capacity markets is uncertain, and allowing new generation contracts to be subject to these mechanisms, *ex post*, would result in continued and unacceptable uncertainty. This would defeat the fundamental purpose of the Draft Decision to provide cost recovery assurances sufficient to encourage the

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[3] Draft Decision at 4; *see also id.* at 23-25, Finding of Fact No. 19.
[4] *See id.* at 27, 42

development of new generation resources in California. The Draft Decision should be modified, as set forth in Attachment A, to clearly provide that new generation developed pursuant to the interim cost allocation mechanism will continue to receive the cost recovery treatment adopted in the Draft Decision for the duration of the commitment or at least ten years from the time that a new unit comes on-line, regardless of the subsequent implementation of any market-based systems, such as capacity markets (although any future capacity market revenues derived from these resources could be netted against the cost of those resources).

Similarly, the Draft Decision expresses interest in considering an "opt-out" mechanism in the Resource Adequacy proceeding.[5] Although the Draft Decision does not address the details of an opt-out mechanism, such a mechanism could allow a load-serving entity to opt out of the Draft Decision's benefit and cost allocation mechanism by demonstrating that it is "fully resourced for the next four or 10 years"[6] or upon a demonstration that "a portion [of the LSE's] resource portfolio was sourced by new resources."[7]

The Joint Parties support consideration of an opt-out mechanism for use with future RFOs and support the Draft Decision's recommendation to consider this issue in Phase 2 of the Resource Adequacy (RA) proceeding, R.05-12-013. However, an opt-out mechanism must not be applied to any resources that are approved for cost recovery pursuant to the Draft Decision because, as discussed above, this would create uncertainty and defeat the fundamental purpose of the Draft Decision. The Draft Decision should be modified, as set forth in Attachment A, to clearly state that any opt-out mechanism subsequently adopted by the Commission will apply only to future RFOs and would not apply to resources already approved for cost recovery pursuant to the Draft Decision.

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5 *See id.* at 35.
6 *Id.*
7 *Id.*

III.

THE DRAFT DECISION SHOULD CLEARLY DEFER DETAILS OF THE PROPOSED ENERGY RIGHTS AUCTION TO PHASE 2

The Draft Decision provides that, in order for the interim cost allocation mechanism to apply, the utilities must conduct periodic auctions for the "energy rights" to all resources that are acquired.[8] The Joint Parties do not, in principle, oppose the idea of using an energy rights auction mechanism. However, such a mechanism raises extremely complex issues that will require much further development.

The Draft Decision appropriately concludes that "[i]t is reasonable to defer many of the implementation details of this cost allocation mechanism to Phase II of this proceeding . . . ."[9] However, portions of the Draft Decision appear to prejudge the nature of the "energy rights" to be auctioned by assuming they will be tolling rights.[10] At this point in time, it is unclear whether it is preferable to auction a financial product or to auction the physical dispatch rights to a particular unit. The Draft Decision should be modified so as not to prejudge the auction design or the nature of the "energy rights" to be auctioned and, instead, should allow the utilities to submit auction proposals in their upcoming long-term procurement plan proceeding filings. Until such time as an energy rights auction mechanism can be approved, an auction can be conducted, and energy deliveries can begin under an energy rights contract, the utilities should continue to manage energy rights in accordance with the original terms of the Joint Parties' proposal. Moreover, the utilities should not be forced to accept any of the resulting bids from an energy rights auction if bid prices and contract terms are not competitive. In such a case, energy rights should continue to be managed by the utility under normal Commission oversight, and another auction should be conducted at a later date. This will ensure that all benefiting customers – both bundled and direct access – realize adequate value from the new generation

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8 *See id.* at 31-33, Finding of Fact No. 20, Conclusion of Law No. 8, Ordering Paragraph Nos. 2, 3.
9 *Id.* at Conclusion of Law No. 9.
10 *See id.* at 32.

contract entered on their behalf. The Joint Parties' recommended modifications are set forth in Attachment A.

IV.

UTILITY-OWNED RESOURCES SHOULD BE ELIGIBLE FOR THE DRAFT DECISION'S COST RECOVERY MECHANISM

The Draft Decision's proposed cost recovery mechanism recognizes that new generation benefits all electric customers in California, not just bundled service customers, and that action now is necessary to "assure adequate new capacity during the time in which we a[re] transitioning to more robust and durable market institutions."[11] Clearly, such benefits arise from *all* new generating resources, whether from PPAs or from new utility-owned resources. Yet, the Draft Decision makes the surprising and incorrect statement that utility-owned generation is "essentially dedicated to bundled customers."[12] This statement should be deleted from the Draft Decision. The Commission should not foreclose the option of using utility-owned generation, either now or in the future, to provide reliability or other benefits to the system as a whole. The cost allocation mechanism adopted in the Draft Decision should apply equally to all new generation, not just PPAs, most importantly because utility generation may be the best deal for customers.

The Commission has repeatedly held that it prefers a hybrid market consisting of both utility-owned and independently-owned generation. In Decision 04-01-050, the Commission concluded that "a portfolio mix of short-term transactions, new utility-owned plant, and long-term PPAs is optimal."[13] In Decision 04-12-048, the Commission confirmed its "preference for a hybrid wholesale electric market consisting of PPAs and IOU owned resources."[14] The Draft Decision departs from these prior decisions to foster both utility-owned and independently-

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[11] *Id.* at 4.
[12] *Id.*
[13] D.04-01-050 at 60.
[14] D.04-12-048 at 127.

owned generation through head-to-head competition. By requiring PG&E and SCE to satisfy all of the system's need for capacity exclusively with PPAs, the Draft Decision effectively eliminates any opportunity for utility-owned generation. This hurts all California electric customers by eliminating a potentially lower cost option.

By eliminating cost-based generation and considering only market-based generation, the prices paid under this transitional mechanism may well be higher. Because there are a limited number of potential new power plants that are capable of coming on-line by 2009, all of the participants will know that price competition will be limited. The market will be more disciplined if the option for cost-based utility generation is retained. As a result, both bundled service and direct access customers will pay less.

This conclusion is not based on mere theory or ideology. It is the reality of the PG&E Long Term RFO. To ensure fair head-to-head competition, the Commission required that an Independent Evaluator (IE) participate in reviewing the evaluation of offers to the utility. The IE offered testimony that the competition was fair, that the resulting mix of two utility and five independent power plants was the best portfolio and, most importantly, that *the utility plant was the most cost-effective*.

Q. What do you conclude about the final contracts?

A. I conclude that the final set of contracts that have been submitted with PG&E's Application to the CPUC represent the best portfolio of new generation resources…. I believe that they represent the overall combined lowest cost/lowest risk set of resources to meet the capacity needs of PG&E's customers in the 2009-2010 period.

Q. One of the final contracts submitted with PG&E's Application was a Facility Ownership [Purchase and Sale Agreement] PSA. From a cost-effectiveness standpoint, how does this offer compare to the other final contracts?

A. It is the most cost-effective of the final contracts….

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Q. Did you sense any bias on PG&E's part in favor of Facility Ownership PSA contracts over PPAs?

A. No. Everything I observed about PG&E's evaluation and decision-making process indicated that PG&E was interested in acquiring contracts that would provide the greatest benefits for its customers – period.[15]

Moreover, as the Draft Decision recognizes, Assembly Bill 380 authorizes the Commission to adopt "a cost allocation methodology that spreads the cost of new generation."[16] AB 380 is not limited to new generation acquired through PPAs. Instead, all new generation that provides "system reliability and local area reliability" should be able to participate in the Commission's approved cost allocation mechanism.

Finally, as the Commission recently recognized in the Greenhouse Gas proceeding, imposing requirements on utility-owned generation while exempting non-utility-owned generation can cause competitive disadvantages to the utility.[17] The same principle applies in this proceeding. Limiting the cost allocation mechanism to non-utility-owned generation would unfairly benefit certain non-utility generators and competitively disadvantage utility-owned generation. Given that the cost allocation mechanism is intended to encourage the development of new generation, it should apply to all new generation, not just PPAs. The Commission should revise the Draft Decision to allow both utility and independent generation to compete head-to-head for the opportunity to satisfy the system's need for capacity.

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15 Direct Testimony of Alan S. Taylor, A.06-04-012 at 28-29.
16 Draft Decision at 39.
17 D.06-02-032 at 26, *aff'd*, D.06-06-071 at 29.

V.

THE DRAFT DECISION SHOULD AUTHORIZE SCE TO PROCEED IN PARALLEL WITH BOTH THE FAST-TRACK AND STANDARD-TRACK PORTIONS OF ITS RFO, SHOULD CONFIRM THE LATEST ON-LINE DATE FOR FAST-TRACK PROJECTS, AND SHOULD CLEARLY STATE THAT THE COMMISSION WILL CONSIDER PPAS SLIGHTLY LONGER THAN TEN YEARS IN TERM TO CAPTURE ANY REMAINING PEAK-SEASON MONTHS IN THE FINAL CONTRACT YEAR

SCE proposed an RFO fast-track that was limited to resources that could be on-line by summer of 2009. However, SCE recognized that there might be other resources that could contribute to reliability that could require additional time to come on-line and proposed an RFO standard-track for resources that could be on-line by 2013. The Draft Decision mentions only the fast-track portion of SCE's RFO proposal and states that the fast-track would include resources that might come on-line by 2010.[18] The Draft Decision makes no reference to the standard-track portion of SCE's RFO proposal.

SCE chose a 2009 on-line date for the fast-track portion of its RFO proposal to limit the fast-track to resources that could serve near-term needs. SCE agrees with extending the limit for fast-track resources to 2010 if this is the Commission's desire. Indeed, extending the latest on-line date for the fast-track RFO to August 1, 2010 is SCE's current preference and recommendation.

Additionally, SCE should have the opportunity to consider resources that could require additional time to come on-line through a standard-track that parallels the fast-track. As set forth in Attachment A, the Draft Decision should expressly authorize SCE to procure up to 1,500 MW in total from the resources offered in the fast-track and standard-track portions of its RFO.

Finally, the Commission should modify the Draft Decision to allow PPAs slightly longer than ten years in term to the extent necessary to capture any remaining peak-season months in

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[18] *See* Draft Decision at 45; *see also id.* at Finding of Fact No. 31; Ordering Paragraph No. 6.

the final contract year. It is most desirable for new generation projects to come on-line slightly before the summer peak season or fairly early in the peak season. If the maximum contract term for such projects is limited to ten years, however, capacity deliveries in the final contract year will cease prior to the end of the peak season. This is not an optimal time for capacity contracts to end. Accordingly, the Commission should consider PPAs slightly longer than ten years in term to capture any remaining peak-season months in the final contract year. SCE considers the peak season to end on October 31 because there is some probability that SCE's system will peak in October.

VI.

RENEWABLES SHOULD BE PERMITTED TO PARTICIPATE IN NEW GENERATION RFOS ON EQUAL TERMS

The Draft Decision states that renewable projects may participate in new generation RFOs and appropriately recognizes that any renewable project that is selected will count for RPS credit.[19] However, the Draft Decision should be modified to expressly state that new generation RFOs are not RPS RFOs. Moreover, the Draft Decision should expressly state that no MPR will be calculated by the Commission for new generation RFOs and no SEP funds will be available to renewable projects that are selected. The Joint Parties' recommended modifications are set forth in Attachment A.

VII.

THE DRAFT DECISION SHOULD CLEARLY IDENTIFY BENEFITING CUSTOMERS

The Draft Decision defines "benefiting customers" on page 26 in footnote 21 and later states on page 46 that cogeneration departing load would not be exempt from the cost allocation mechanism. To ensure clarity, the Draft Decision should be modified to define "benefiting customers" as follows:

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[19] *Id.* at 29.

"Benefiting Customers" means all bundled-service customers, Direct Access (DA) customers, Community Choice Aggregation (CCA) customers, and others who are located or locate within the distribution service territory of an Investor Owned Utility (IOU) but take service from a local publicly-owned utility (as defined in Public Utilities Code Section 9604(d)) subsequent to the commitment date for new generation, including Customer Generation Departing Load (CGDL) and Municipal Departing Load (MDL) customers.

VIII.

CONCLUSION

For the foregoing reasons, the Joint Parties respectfully request that the Commission adopt the Draft Decision, subject to the modifications set forth in Attachment A.

Respectfully submitted,

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ATTACHMENT A

Modify text on page 4 as follows:

Accordingly, we will adopt a modified version of the Joint Parties' proposal *on a limited and transitional basis*. This new cost allocation mechanism will not apply to commitments for new generation made after ~~only apply until~~ new institutions are decided upon, developed and in place. However, new generation developed pursuant to the interim cost allocation mechanism will continue to receive the cost recovery treatment adopted in this decision for the duration of the commitment or at least ten years from the time that a new unit comes on-line. We will only consider PPAs longer than ten years in term to capture any remaining peak-season months in the final contract year.~~We will not approve this cost allocation for any additional utility owned generation, since that generation is essentially dedicated to bundled customers.~~

Modify text on page 5 as follows:

Our intent is that the long-term market rules and institutions to be developed in Phase II of the RA proceeding will supersede these temporary arrangements. That proceeding will examine creating multi-year RA requirements for all LSEs as well as capacity markets and other arrangements for assuring that sufficient generation is built when and where it is needed. ~~Ideally, cost recovery for plants built pursuant to these temporary arrangements ordered in this decision can be completed under the new structure, with a seamless transition.~~

Modify text on page 15 as follows:

Under the JP, "benefiting customers" is defined as all bundled-service customers, DA, community choice aggregators (CCA) and others~~IOU customers~~ who are located or locate within the distribution service territory of an IOU but take service from a local publicly-owned utility (POU) subsequent to the commitment date for new generation, including Customer Generation Departing Load (CGDL) and Municipal Departing Load (MDL) customers.

Modify text on page 26, note 21 as follows:

Benefiting customers are defined as all bundled service customers, direct access, community choice aggregators, and others~~IOU customers~~ who are located or locate within a utility distribution service territory, but take service from a local POU subsequent to the commitment date for ~~the~~ new generation ~~goes into service~~, including Customer Generation Departing Load (CGDL) and Municipal Departing Load (MDL) customers. All benefiting customers receive resource adequacy counting credits.

Modify text on page 27 as follows:

- New generation developed pursuant to the interim cost allocation mechanism adopted in this decision will receive cost recovery from~~We limit the maximum term of any cost paid by~~ all customers ~~to the term of the contract, or 10 years, which ever is less, from the time that the new unit comes online~~ for the duration

of the commitment or at least ten years from the time that a new unit comes on-line. We will only consider PPAs longer than ten years in term to capture any remaining peak-season months in the final contract year.

- We intend this mechanism to be strictly transitional. It should not apply to commitments for new generation made after ~~stay in place only until~~ new market-based institutions are decided upon, developed and functioning. However, new generation developed pursuant to the interim cost allocation mechanism will continue to receive the cost recovery treatment adopted in this decision for the duration of the commitment or at least ten years from the time that a new unit comes on-line. We will only consider PPAs longer than ten years in term to capture any remaining peak-season months in the final contract year.~~Cost recovery for any assets that are developed under these interim arrangement will subsequently be handled under the new market-based system.~~

- As previously determined in D.04-12-048, all currently bundled customers, as well as new load locating within an IOU service area but taking service from POUs, are responsible for any long-term commitments entered into by the IOUs for 10 years, unless otherwise modified by the Commission.

Modify text on page 29 as follows:

IOUs are encouraged to hold all-source solicitations to select long-term contracts but only new capacity is eligible for the cost-allocating mechanism. Renewable energy projects selected from a competitive long-term RFO designed to add new capacity to the whole system, will be eligible for the cost allocation mechanism, but RPS credit will also be shared with all customers. However, these RFOs are not RPS RFOs, and no market price referent (MPR) will be calculated by the Commission nor will supplemental energy payment (SEP) funds be available to renewable projects that are selected. In reality, we expect that most renewable projects will continue to prefer the RPS solicitation process so long as that process is available in the near term. If the utility selects an existing facility or demand response resource to fill some of its long-term need, the contract will not be eligible for the cost-allocation mechanism.

Delete text on pages 29-30 as follows:

- ~~We do not prohibit the utilities from owning their own generation, nor building their own power plants. However, we concur with Mirant, Sempra, AReM and other parties that recommended we not allow utility-owned generation to qualify for this cost-benefit allocation mechanism. We do not allow resources chosen by the IOU that are utility built or utility owned[24] to be eligible for cost recovery through a non-bypassable wires charge. As many parties noted, there are numerous long-term energy benefits to utility owned generation, and it is difficult to isolate just the first few years worth of capacity value of a 30-year or longer utility-owned asset. We recognize that this determination affects PG&E the most because (1) SCE has already stated that it will only consider PPAs in its future LT RFOs and (2) PG&E has already selected two projects that will be utility-owned projects.[25]~~

Modify text on page 32 as follows:

> will plan to conduct periodic auctions for the energy rights to all resources acquired under this interim proposal. ~~These auctions will provide the right for another entity to manage the energy component of the contracts. Essentially the IOU will sell the tolling right, and retain the RA benefit which it will share with all customers paying for the capacity.~~ The IOUs should consider hiring a third party to administer the auction. The auction will be overseen by the IOU, the procurement review group and, if there is one, the third-party evaluator. The cost of administering the auction shall be considered part of the IOU's procurement expenses unless the IOU contracts with a third party, in which case, the cost of the auction shall be considered part of the cost of the contract. The IOU's own procurement group will be allowed to bid on the auction for the energy. The purpose of the auction will be to maximize the energy value and minimize the residual cost of the RA capacity. The auctions should be periodic so as to capture the fluctuations in the energy market. The IOUs are not required to accept any of the resulting bids if bid prices and contract terms are not competitive and, if there are no bids accepted ~~for the tolling right to the contract~~, then the IOU will manage the energy dispatch in accordance with the original terms of the JP~~, i.e., it will be valued at spot market prices~~. Implementation details will be worked out in Phase II of this proceeding.

Modify text on page 38 as follows:

Based on the analysis of future system need presented by CEC at the March 14, 2006 workshop, we find that 1,500 MW is likely to be a conservative estimate of SCE's future system need for new resources. We will address in Phase II whether SCE has need beyond 1,500 MW. In terms of timing, we expect a decision in Phase 2 of R.06-02-013 prior to the final contract selection in SCE's "Fast Track" RFO. ~~Therefore, w~~We find here that it would be acceptable for SCE to procure up to 1,500 MW in total from the resources offered in the ~~its~~ "Fast Track" and "Standard Track" portions of its RFO, depending on the robustness of offers received.

Modify text on page 42 as follows:

We are mindful of the optimism shared by several parties that a functioning, centralized capacity market will create the proper market signals to promote investment in new generation in California. ~~While we adopt the cost-allocation methodology set forth herein, we are hopeful that a market-based approach, such as a functioning, centralized capacity market, or satisfactory alternative, is in place before the new generation discussed here comes on line and is subject to this proposal.~~ However, out of a need to ensure that new generation does get built, we adopt a cost-allocation methodology that is designed to provide an incentive for investment now.

Modify text on page 45 as follows:

We disagree with Sempra, and we will allow PG&E to designate up to 2,250 MW of new generation ~~that is not utility-owned~~ from the recent LTPP RFO to be eligible for the cost-allocation methodology established in this decision. ~~CC8 is not eligible for the cost allocation mechanism since it is a utility-owned resource.~~ If the PG&E Application goes forward as is,

PG&E has signed a Purchase and Sale Agreement (PSA) with E&L Westcoast Colusa, and an Engineering Procurement and Construction (EPC) contract with Wartsila Humboldt. ~~Both projects will result in utility owned power plants that are not eligible for this cost allocation. All three~~Both of these projects will count towards PG&E's needed MW.

Modify Finding of Fact No. 18 as follows:

18. We find that it is reasonable to adopt a cost allocation mechanism on a limited and transitional basis that will not apply to commitments for new generation made after ~~that will only apply until~~ we decide upon, develop and put in place new market based institutions in Phase II of R.05-12-013. However, new generation developed pursuant to the interim cost allocation mechanism will continue to receive the cost recovery treatment adopted in this decision for the duration of the commitment or at least ten years from the time that a new unit comes on-line. We will only consider PPAs longer than ten years in term to capture any remaining peak-season months in the final contract year.

Modify Finding of Fact No. 20 as follows:

20. As set forth ~~with particularity~~ herein, each IOU must conduct a periodic auction for the energy rights to all resources acquired under this interim proposal in order to have the cost allocation plan applicable to their new generation resources. Implementation details will be worked out in Phase II of this proceeding. Until such time as an energy rights auction mechanism can be approved, an auction can be conducted, and energy deliveries can begin under an energy rights contract, the IOUs should continue to manage energy rights in accordance with the original terms of the JP.

Modify Finding of Fact No. 26 as follows:

26. We do not adopt an opt-out mechanism to this cost allocation methodology today, but defer further consideration to Phase II of R.05-12-013, so it can be considered in concert with capacity markets and multi-year RAR.18. Any opt-out mechanism that we subsequently adopt will apply only to future RFOs and will not apply to resources already approved for cost recovery pursuant to this decision.

Modify Finding of Fact No. 29 as follows:

29. PG&E has already brought the Commission over 2,200 MW of contracts in A.06-04-012, following the completion of its RFO for the need authorized in D.04-12-048. We will allow PG&E to apply the cost allocation methodology to contracts with qualifying new generation ~~that is not utility owned~~.

Delete Finding of Fact No. 30 as follows:

~~30. PG&E can not apply the cost allocation methodology to CC8 or to its contracts with E&L Westcoast Colusa or with Wartsila Humboldt.~~

Modify Finding of Fact No. 31 as follows:

31. SCE has indicated a willingness to procure up to 1,500 MW of new long-term contracts and can ~~launch~~ complete a "fast track" RFO as early as February 2007. While we anticipate a decision in Phase II of this proceeding prior to the final contract selection in SCE's "fast track" RFO, we find it reasonable for SCE to procure up to 1,500 MW in total from the resources offered in the ~~its February 2007~~ "fast track" and "standard track" portions of its RFO, with resources acquired in both RFOs being eligible for the cost allocation mechanism adopted in this decision.

Add Finding of Fact No. 38 as follows:

38. For purposes of this Decision, "benefiting customer" is defined as all bundled-service customers, Direct Access (DA) customers, Community Choice Aggregation (CCA) customers, and others who are located or locate within the distribution service territory of an Investor Owned Utility (IOU) but take service from a local publicly owned utility (as defined in Public Utilities Code Section 9604(d)) subsequent to the commitment date for new generation, including Customer Generation Departing Load (CGDL) and Municipal Departing Load (MDL) customers.

Modify Conclusion of Law No. 8 as follows:

8. Pursuant to the plan adopted herein, each IOU is to conduct a periodic auction for the energy rights to all resources acquired pursuant to this plan. Implementation details will be worked out in Phase II of this proceeding. Until such time as an energy rights auction mechanism can be approved, an auction can be conducted, and energy deliveries can begin under an energy rights contract, the IOUs should continue to manage energy rights in accordance with the original terms of the JP.

Modify Ordering Paragraph No. 2 as follows:

2. Pursuant to the plan adopted herein, each IOU is to conduct a periodic auction for the energy rights to all resources acquired pursuant to this plan in order to have the cost allocation plan applicable to their new generation resources. Implementation details will be worked out in Phase II of this proceeding. Until such time as an energy rights auction mechanism can be approved, an auction can be conducted, and energy deliveries can begin under an energy rights contract, the IOUs should continue to manage energy rights in accordance with the original terms of the JP.

Modify Ordering Paragraph No. 5 as follows:

5. Pacific Gas and Electric Company ~~is ordered to expeditiously~~ has signed ~~the~~ long-term contracts for 2,5~~2~~00 megawatts and these contracts are currently pending before the Commission in A.06-04-012. ~~Non-utility owned generation will be eligible for this newly adopted cost allocation plan.~~

Modify Ordering Paragraph No. 6 as follows:

6. Southern California Edison Company is to forthwith conduct a ~~"fast track"~~ request for proposal for up to 1,500 megawatts and bring long-term contracts from the "fast track" portion of its RFO to the Commission for approval no later than February 2007, or be asked to justify its non-compliance with this order. ~~Non-utility owned generation will be eligible for this newly adopted cost allocation plan.~~

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), PACIFIC GAS AND ELECTRIC COMPANY (U 39-E), NRG ENERGY, INC., THE UTILITY REFORM NETWORK, COALITION OF CALIFORNIA UTILITY EMPLOYEES, AND THE CALIFORNIA UNIONS FOR RELIABLE ENERGY ON THE DRAFT DECISION OF ALJ BROWN ON NEW GENERATION AND LONG-TERM CONTRACT PROPOSALS AND COST ALLOCATION on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

× Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

☐ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or other addressee(s).

☐ Placing copies in properly addressed sealed envelopes and depositing such copies in the United States mail with first-class postage prepaid to all parties.

☐ Directing Prographics to place the copies in properly addressed sealed envelopes and to deposit such envelopes in the United States mail with first-class postage prepaid to all parties.

Executed this **10th day of July, 2006**, at Rosemead, California.

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